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AEY 11/30/01

EFFICACY REVIEW

DATE: IN10-25-01 OUT11-29-01

FILE OR REG. NO. 1021-1739

PETITION OR EXP. PERMIT NO.

DATE DIV. RECEIVED October 12, 2001

DATE OF SUBMISSION September 12, 2001

DATE SUBMISSION ACCEPTED

TYPE PRODUCT(S): (I,)D, H, F, N, R, S

DATA ACCESSION NO(S). 455009-06;D278753;S605098;Case#066277;AC:306

PRODUCT MGR. NO. 03-Layne/Stanton

PRODUCT NAME(S) EVERCIDE® Synergized Permethrin Pour-On 2783

COMPANY NAME McLaughlin Gormley King Company

SUBMISSION PURPOSE Provide performance data in support of claims for control of brown dog tick, *Rhipicephalus sanguineus*, to be added to the product label.

CHEMICAL & FORMULATION Permethrin: (3-phenoxyphenyl)methyl(±)cis, trans-3-(2,2-dichloroethenyl) 2,2-dimethylcyclopropanecarboxylate*

*Cis/trans ratio:	1.00%
Minimum 35%(±) cis, Piperonyl butoxide, technical	1.00%
Maximum 65%(±) trans (7.13 lbs./gal. ready-to-use pourable liquid)	

CONCLUSIONS & RECOMMENDATIONS The data presented in EPA Accession (MRID) Number 455009-06, having been taken from a standard laboratory test simulating actual use and meeting some of the requirements of § 95-8(a)(5)(vii) and (viii) on p. 256 and (7) and (8) on p. 258, and meeting the standard of § 95-8(b)(1)(vi)(A) on p. 260 of the Product Performance Guidelines, are nevertheless inappropriate to support the tick claim for the subject product for the following reasons: 1) the concentration of permethrin in the submitted data is from 50 to 400 times lower than that found in the subject product; 2) the submitted data is for permethrin alone, no piperonyl butoxide synergist is present; 3) dipping ticks sewn into tea bags in the test solution does not really simulate the action of a pour-on being applied to livestock; 4) according to § 95-8(b) subpart (1)(vi)(A) on p. 260, 75% reduction in infestation must be maintained for one week after application, whereas observations in the submitted data did not extend past 48 hours; 5) brown dog tick, *Rhipicephalus sanguineus*, is not an appropriate (to be continued)

species for this use pattern, since brown dog tick is seldom if ever found on cattle or other livestock. Volume IV of "Analysis of Specialized Pesticide Problems: Invertebrate Control Agents - Efficacy Test Methods: Livestock, Poultry, Fur & Wool Bearing Animals" published as EPA-540/10-77-002 in January 1977, states on p. 16 the following tick species that are most frequently found on cattle: *Amblyomma americanum*, the lone star tick; *A. maculatum*, the Gulf Coast tick; *Dermacentor albipictus*, the winter tick; *D. andersoni*, the Rocky Mountain wood tick; *D. occidentalis*, the Pacific Coast tick; *D. variabilis*, the American dog tick; *Ixodes scapularis*, the blacklegged tick; and *Otobius megnini*, the spinose ear tick. The registrant may choose one or more of these as the test arthropod in field testing which applies the subject product or similar formulations to actual livestock according to the label.

OBJ Vern L. McFarland, IB